

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**M. LA-TROY ALEXANDRIA-WILLIAMS,** )

)

)

**Plaintiff,** )

)

)

**v.** )

)

**Case no. 2:20-02715-MSN-atc**

)

**MARK GOINS, in his official capacity** )

**as Tennessee Coordinator of Elections,** )

**MARY MANCINI, in her official capacity** )

**as Chairwoman of the Tennessee Democratic** )

**Party, LINDA PHILLIPS, in her official** )

**capacity as Shelby County Administrator** )

**of Elections,** )

)

**Defendants.** )

)

---

**DEFENDANT MARK GOINS' MOTION TO DISMISS**

---

Comes the Defendant Mark Goins, in his official capacity as Coordinator of Elections for the State of Tennessee, and respectfully moves this Court to dismiss Plaintiff's complaint against him for lack of subject matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1) and failure to state a claim upon which relief can be granted pursuant to Fed. R. Civ. P. 12(b)(6).

This motion is supported by an accompanying memorandum of law.

Respectfully submitted,

HERBERT H. SLATERY III  
Attorney General and Reporter

/s/ Kelley L. Groover

KELLEY L. GROOVER (BPR 034738)

Assistant Attorney General

Public Interest Division

Office of Tennessee Attorney General

P.O. Box 20207

Nashville, TN 37202

(615) 532-2591

kelley.groover@ag.tn.gov

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion has been sent through the court's ECF system and/or first class U.S. Mail, postage prepaid, to:

M. La-Troy Alexandria-Williams  
3250 Commercial Parkway  
Memphis, TN 38116

John Ryder  
Pablo Varela  
Harris Shelton Hanover Walsh PLLC  
One Commerce Square  
40 Main Street, Suite 2700  
Memphis, TN 38103-2555

J. Gerard Stranch, IV  
Benjamin A. Gastel  
Seamus T. Kelly  
Branstetter, Stranch, Jennings PLLC  
223 Rosa L. Parks Avenue, Suite 200  
Nashville, TN 37203

this 29th day of January, 2021.

/s/ Kelley L. Groover  
KELLEY L. GROOVER  
Assistant Attorney General